

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)
)
v.) Docket No. 20-cr-40036-TSH
)
)
VINCENT KIEJZO)
)

ASSENTED-TO MOTION TO MODIFY PRETRIAL RELEASE CONDITION

Now comes the defendant Vincent Kiejzo and hereby moves to modify his pretrial release condition of home confinement. Specifically, after consultation with Probation and with the assent of the government, Mr. Kiejzo moves to modify condition 8(t)(ii) as described in the Order Setting Conditions of Release. (*See* D.E. #19).

The condition, as presently ordered, reads: "Home Detention. You are restricted to your residence at all times except as pre-approved by the court; or location monitoring via RF, can leave for medical/mental treatment, court, religious reasons" Mr. Kiejzo moves to modify this condition to read instead: "Home detention. You are restricted to your residence at all times except for pre-approved and scheduled absences for employment, education, religious activities, medical treatment, attorney visits, court appearances, court-ordered obligations, or essential activities as approved by the officer. At all times, you will be subject to location monitoring."

This modification is consistent with the Probation Department's review and approval of requests for temporary leave from home detention in other cases, and explicitly permits a broader array of legally permissible activities. Mr. Kiejzo has been supervised on conditions of release for the past 10 months and has been in full compliance. Pursuant to Local Rule 7.1, counsel conferred with the government and understands that the government assents to this motion.

Respectfully submitted,
VINCENT KIEZJO
By His Attorney,

/s/ Sandra Gant
Sandra Gant, B.B.O.# 680122
Federal Public Defender Office
51 Sleeper Street, 5th Floor
Boston, MA 02210
Tel: 617-223-8061

CERTIFICATE OF SERVICE

I, Sandra Gant, hereby certify that this document filed through the ECF system will be sent electronically to the registered participant(s) as identified on the Notice of Electronic Filing (NEF) on August 21, 2021.

/s/ Sandra Gant
Sandra Gant